

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
SPYROS PANOS,

Plaintiff,

-against-

No. 18-cv-02066-KMK

UNIVERSAL FOREST PRODUCTS, INC. and
SHAWNLEE CONSTRUCTION, LLC,

Defendants.

-----X

DECLARATION OF GARY J. MOUW

I, Gary J. Mouw, declare as follows:

1. I am a partner of Varnum, LLP, counsel for Defendants Universal Forest Products, Inc. and Shawnlee Construction, LLC ("Defendants") in this matter.

2. I have been admitted to practice *pro hac vice* as counsel for Defendants in this action in the United States District Court for the Southern District of New York.

3. I submit this declaration in support of Defendants' Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6).

4. Attached to this Declaration are the following Exhibits:

A – *Contractors and Developer Charged in White Plains Federal Court with Conspiracy, Fraud, and Kickback Scheme* (May 6, 2015);

B – *Craig Wolf, Vineyard Commons developer indicted again*, POUGHKEEPSIE JOURNAL (May 7, 2015); and

C – *How the East Fishkill developers of a luxury housing complex in Highland went bankrupt*, POUGHKEEPSIE JOURNAL, (April 14, 2013)

I declare under penalty or perjury that the foregoing is true and correct.

Date: August 16, 2018

s/Gary J. Mouw
Gary J. Mouw